III.   REMARKS

Claims 1-22 are pending in this application. Claims 1-5, 8-10 and 13-22 are rejected under 35 USC 102(b) as allegedly being anticipated by Matsuda et al., US 2002/0133573 ("Matsuda"), with Poger et al., US 6,772,420 B1 ("Poger"), providing intrinsic evidence for a device type being embedded in a MAC address. Claims 6-7 and 11-12 are rejected under 35 USC 103(a) as being allegedly unpatentable over Matsuda as applied to claims 4 and 10, in view of Okano et al. US 2002/0062485 ("Okano"). Applicant respectfully traverses the 35 USC 102(b) and 35 USC 103(a) rejections for the reasons provided below.

Applicant does not acquiesce in the correctness of the rejections and reserves the right to present specific arguments regarding any rejected claims not specifically addressed. Further, Applicant reserves the right to pursue the full scope of the subject matter of the claims in a subsequent patent application that claims priority to the instant application.

REJECTION OF CLAIMS 1-5, 8-10 and 13-22 UNDER 35 U.S.C. §102(b)

With regard to the 35 U.S.C. §102(b) rejection over Matsuda with Poger providing intrinsic evidence, Applicant asserts that Matsuda and Poger do not teach each and every feature of the claimed invention.

Specifically regarding the Office's rejections of claim 1 (and similarly claims 10, 14 and 19) and in addition to all previously presented arguments:

Applicant submits that Matsuda and Poger fail to teach each and every feature of claim 1 (and similarly claims 10, 14 and 19). Claim 1 recites, *inter alia*, "generating a

unique device identifier for each device entry." (The previous element and subsequent phrase "wherein the generating is performed by the server" make clear the referenced "generating" is done by the server.) The Office alleges Matsuda teaches these features citing passages [0065] ln. 27-38. Applicant respectfully submits, Matsuda does not teach these features.

Initially, Applicant's claim 1 provides a method in which the server generates a unique device identifier for each device entry.

By contrast, Matsuda states "client NOA suggests a desirable IP address and host name for server NOA to use in the configuration of client NOA." [0065] ln. 5-7. Here, the server NOA is not generating a unique device identifier for each device.

[As a preface to Applicant's argument it is important to note that Applicant does not concede that Matsuda's "device IP address" is equivalent to the "unique device identifier" of Applicant's invention. The passages of Matsuda generally cited by the Office – to wit [0064], [0065] and [0066] – state "The DHCP table keeps track of a device's" (1) "(MAC) address"; (2) "corresponding network name binding"; (3) "IP address"; and (4) "'name-in-use' code." [0064] ln. 4-16. Matsuda does not teach that any of the preceding is a "unique device identifier". Therefore, any reference by Matsuda to any one of these items in the DHCP table does not teach a "unique device identifier."]

Assuming *arguendo* that Matsuda's "device IP address" is equivalent to the "unique device identifier" of Applicant's invention, Matsuda states "if the IP address of client NOA is in use by another device, server NOA modifies the IP address for client

NOA." [0065] ln. 31-33. Thus, the server NOA only modifies the IP address of the device if the IP address that has been suggested earlier is already in use.

Moreover, in Matsuda, because the server NOA does not generate a unique IP address for each client NOA in the first instance, the server NOA must check to see if the modified IP address is in use: "after the IP address of client NOA is modified, server NOA determines whether the new IP address is also in use by another device." [0065] ln. 33-36. Matsuda continues: "server NOA continues to assign and check the network IP address of client NOA in this manner until a suitable IP address is ascertained." [0065] ln. 36-38. Thus, Matsuda requires a reiterative process.

Interestingly, Matsuda discloses an extensive reiterative process required due to the absence of a server "generating a unique device identifier for each device entry." In Matsuda, (1) client NOA suggests an IP address and name to server NOA; (2) server NOA acquires MAC address and retrieves previous name if it exists; (3) if previous name does not exist, a name is assigned; (4) server NOA then checks "not in use" field of DHCP table to see if selected name is in use; (5) if it is - the process reiterates; (6) server NOA determines if IP address is in use and continues modifying, checking and re-modifying as described in the previous paragraphs. [0065] ln.5-38.

As described by Applicant's invention, by the server "generating a unique device identifier for each device entry", the modifying, checking and re-modifying reiterative process for every entry in the DHCP table as required by the Matsuda disclosure is not required by Applicant's invention.

Accordingly, it is clear Matsuda and Poger do not teach these features.

Further, Claim 1 recites, *inter alia*, "wherein the generating is based on a particular user and a particular device." The Office alleges Matsuda teaches these features citing passages [0065] ln. 27-38. Matsuda does not teach these features.

Here again, the server generated "unique device identifier for each device entry" is based on both a "particular user and a particular device".

By contrast, as described in more detail in the argument above, Matsuda discloses the client NOA suggests the IP address and name for the client NOA. [0065] ln. 5-7. Matsuda makes no reference to the user of the client NOA. Matsuda does not teach anything about "a particular user" and, therefore, cannot teach generating a "unique device identifier" based upon a "particular user."

Further, since all of the entries in the DHCP table described by Matsuda are used to describe the "device", it is clear that Matsuda cannot teach generating a unique device identifier for a "particular user" and "particular device" since only the device is identified. [0065]

Accordingly, it is clear Matsuda and Poger do not teach these features.

For all of the above stated reasons and all previously submitted arguments, Applicant submits that claim 1 (and similarly claims 10, 14 and 19) is not anticipated by Matsuda and Poger. Applicants reiterate the foregoing arguments with respect to claim 1 for independent claims 10, 14 and 19 and respectfully request that the Office withdraw the rejection of independent claims 1, 10, 14 and 19 under 35 U.S.C. §102(a) and §103(a).

With respect to the dependent claims, Applicant herein incorporates the arguments presented above with respect to the independent claims from which the claims depend. Furthermore, Applicant submits that all dependant claims are allowable based on their own distinct features. Since the cited art does not teach each and every feature of the claimed invention, Applicant respectfully requests withdrawal of this rejection.

IV. CONCLUSION

In addition to the above arguments, Applicant submits that each of the pending claims is patentable for one or more additional unique features. To this extent, Applicant does not acquiesce to the Office's interpretation of the claimed subject matter or the references used in rejecting the claimed subject matter. Additionally, Applicant does not acquiesce to the Office's combinations and modifications of the various references or the motives cited for such combinations and modifications. These features and the appropriateness of the Office's combinations and modifications have not been separately addressed herein for brevity. However, Applicant reserves the right to present such arguments in a later response should one be necessary.

In light of the above, Applicant respectfully submits that all claims are in condition for allowance. Should the Examiner require anything further to place the application in better condition for allowance, the Examiner is invited to contact Applicant's undersigned representative at the number listed below.

Respectfully submitted,

/David E. Rook/

Date: June 3, 2008

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